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LAND AND WATER LAW REVIEW

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NUMBER 1

DISCUSSION: ENVIRONMENT

Conflict between imposing environmental controls on public lands for preservation of lands for future use and the need to use the public lands for industrial purposes.

Cost-benefit analysis of environmental control.

Possible solution to the environmental crisis utilizing the public land resources and method of disposal.

MR. BALDWIN: We have a difference of opinion if not a dialogue here. I suppose one way to bridge the gap would be to try to incorporate the economic value of the Sierra Club books, the Salem ads, all of the pictures, all of the ads that portray environment in its pristine character and add them up. Then we would have a true economic picture, and then we might all agree to a different kind of use of public land.

MR. McCLOSKEY: I do not want to become involved in a rebuttal here but I do think that the presentation of some of these papers has suggested a few strong elements which have nothing to do with the Sierra Club's actual position. Just for the record we are not asking that the entire country be turned into a wilderness. We never have. We are not asking that people go down to the lowest level of consumption. I think that it is important to realize that most of these resource conflicts on a national basis do not involve large changes of percentage points in terms of allocation. In most categories 90 per cent or more of the commodity base has been given to the commodity interest. Environmentalists are only trying to get one or two percentage points more. Every time we try to do it, we are confronted with the argument that you guys want 90 per cent or more and how are we going to live. This has nothing to do with reality. For future generations this would

make a nice academic argument; however, I think the best way to answer it is to look at our experience. Look at all of the strong executive decisions made in the past for future generations: the national forests, the national parks and monuments which were set aside under the Antiquities Act. Do we find this future generation, of which you and I are now a part, rising up in terrific wrath against this horrible subjectivity of our past presidents? We have nothing to indicate that the same conservationists and environmentalists, who are the heirs of the proceeding generations that did this for us, are now doing anything which will be any less popular in the future.

Finally, on the question of economics, certainly we do not deny that economic valuations and benefit-cost ratios are not a convenient way of organizing a lot of comparative materials. Just to say that we had not got around to solving the last technical problems, that is quantifying intangibles, is not to say that we are on the verge of a workable system. It is like saying we have an automobile that does not have an engine, but that we have a great transportation system. You must have faith in it. The problem is that intangibles cannot be quantified. I think that we are kidding people when we lead them to believe that we are on the verge of a system that will solve all of our problems. To say that you are close is to say that you are five years away in the opinion of the people on the opposite side of the argument. This type of technical relativism does not contribute to solving our basic problems. These basic questions of public policy must be based on values, including subjective judgment of what the people want, where they want to go, and what kind of future they desire.

MR BARRY: The idea that the user interest can capture the social science of economics is absurd. Most of the economists that I have talked to now believe that the idea we have advanced about a national growth factor and about our gross national product and so forth have been arrived at by poor economic theorizing. Indeed, one economist states that we have done our accounting poorly. We have failed to depreciate many of our assets as we have depreciated and degraded them

in our various industrial activities. In other words, we have had no growth in our country because now we are beginning to be charged with the heavy bills of having polluted almost all of our waters, threatened certainly our air and even more so the sea. Now I'd like to know whether the economists are representing the brotherhood of economists or whether you are representing those economists who represent big industry.

MR. SCHANZ: One of the standard rules in our profession, after presenting a view on a specific point, is that if the people who speak in the public interest and those who speak for industrial interests are both a little bit unhappy, we either did a pretty good job or we were objective.

I think that I am speaking for the economists who are interested in our social accounting. On the ledger we would be complete in that social accounting. If we had inaccurately, in our depreciation, accounted for the past then perhaps we have made some very bad decisions. However, hopefully in the future we will account for all costs. What I am saying is that in certain situations I think the environmentalists are right. You cannot go through some kind of a cost benefit analysis. The environmental threats are so serious that we have to absolutely act and say stop, but I do think in some of these areas we can do a better job of accounting for all of the costs and benefits, tangible or intangible. Granted that this is difficult, granted that we do a very poor job, this kind of orderly analysis has its advantages. I think most economists would like to see us continue this way, using our benefit cost analysis. Most economists feel that all people have some stake in resource use and we should be responsible for some form of payment for that use. We should recognize in the resource use that there is a cost involved ;there is a cost involved in and resource use direction which might be taken.

MR. BARRY: You have talked about the preservation of the environment as an added cost of our technological activities. Do you include as a cost the benefit which is foregone? Whenever there is a technological or industrial development this cost is never reckoned. For example, we fight industrialists in Oregon and I understand from the newspapers

that they are fighting the industrialists in Arizona, because they are polluting the air and not paying for it. They are not applying the particular technology which is necessary to protect the environment. Furthermore, they are not paying for the air they damage and the benefits which are foregone throughout the neighboring areas. Do you include that as a cost in your economic reckoning?

MR. SCHANZ: As you describe it in the latter part of your statement, I certainly do.

MR. BARRY: Do you think they should pay somebody for the damage they do to the environment and that they should also do as much as they can to prevent anything from happening to the environment?

MR. SCHANZ: Certainly I agree with that. I would also wish that the public would recognize the payment they are making.

MR. BARRY: What should we do? Give the industrialist a medal? If they did not operate at all we would not give them a medal. Things would be just the way they were if they did not operate, why should we decorate them for destroying our environment?

MR. SCHANZ: I am not saying that the industrialists should be recognized, but I am saying that the public should realize that the costs were built into the formula.

MR. MOCK: Could I ask a clarifying question on this dialogue? Isn't it true in 1910 or 1912 that Arizona smelters paid the cost of damaging the environment in one of the state's leading cases?

MR. CARVER: (*question directed to Mr. McCloskey*) Do you recognize, and this is directed to our public issues today, from the standpoint of the environmentalists, that environmentalism may suffer if the public should associate some immediate environmental crisis; for example the lights going out or the lack of a generating capacity, with the opposition to the power plants raised by the environmentalists. In other words, do you see the responsibility involved; if you oppose

project A and convince the public that they should reduce their consumption of electricity, when the lights they want go out, they will blame the environmental movement for causing it. I question not what you think about it, but whether you think the cause of environmentalism may possibly suffer because of it.

MR. McCLOSKEY: I think it can. It should be a very real concern. I am aware that there are many parts of the country faced with this problem. I would like to pursue the subject with you, particularly in light of your role in the Federal Power Commission. Suffice it to say, we believe part of the problem could be taken care of by remedial legislation or federal aid legislation which the power industry opposes, but we support, if not in toto, at least in part. We recognize that part of the problem is involved in the growth rate of power consumption. We are fearful that this cannot continue. We hope we will be able to redirect public policy to reduce those levels of consumption. Conceivably this will be difficult. Right now the argument concerns the location of power plants. It is a somewhat one sided process. We may suffer a public relations setback if the power industry is successful in putting the blame on us, but I think that is a misrepresentation of the case. I hope that we can recover if we do.

MR. CARVER: It is possible, of course, that a wrong environmental decision may be reached if environmental opposition continues to the point of an aggravated crisis; then you have to have an emergency recovery from it. I think you should recognize that as being involved.

MR. BALDWIN: On the other hand, you have the compensating factor that the more power that is produced the more pollution there will be.

MR. CARVER: That is the point I am trying to reach. I believe it is quite critical. Environment, as we are thinking of it here, in a kind of pastoral sense, is good, but environment is also having elevators run.

MR. McCLOSKEY: No, I'm not considering it in a pastoral sense.

MR. CARVER: I do not mean to offend anyone or use strong words. I simply mean that the diversion of energy from a fuel into mechanical energy is central to a lot of our troubles. It is also essential to a lot of our solutions including the very solutions that you are seeking to have the industries apply.

MR. CARMICHAEL: To me the inquiry which will not be brought to public attention in an emergency situation, but is much more relevant, is that of patterns of consumption. If I can buy 200 watt bulbs and can pay what seems to be the same amount in terms of my monthly electric bill as I would pay if I used 50 watt bulbs and if I am designing a million cubic foot building and designed that on specifications to be cooled down to 60 degrees as opposed to 70 degrees during the entirety of the air conditioning system, these to me are the relevant inquiries which unfortunately will not come to public attention because they are long term and undramatic.

MR. CARVER: That is my point. I was trying to direct my question to tactics. I am going to agree with you on the long term strategy.

VOICE FROM THE AUDIENCE—So did the economists.

MR. JOHNSON: The only reason that we can legitimately worry about environment is that we have been successful in industry and in the business world. We are now affluent in a major way. We can now make choices about environment. There is no need to stop these things that have given us the opportunity to make choices but instead we must recognize that future choices be made with an increased cost. In other words, power will cost a little more if it is provided in a clean way. The automobile of tomorrow will cost a little bit more, because it will be a product of research and technology that will give us cleaner air. I think that the power crisis may provide some blowbacks and some back and forths at this particular moment. The public will have to realize, and I think they will realize, that clean air, clean water and a better environment are going to cost a little more, and I fully

agree with you, Don, that environment is the elevator running, the automobile or the living conditions which we have set. I think the public needs to be made aware that quality environment does not come free but that it is worth the price. This gets back to the economist's point, and the realization we need to pay a little bit more for our environment.

MR. BARRY: But who should pay?

MR. TRELEASE: I would just like to observe that Jack Schanz was misunderstood a few minutes ago. I think that he has always recognized that these costs do exist, so let's count them. In the past there were social costs of industry progressing and perhaps this progress is destroying the environment. In the future there will be social costs of preserving the environment. I think that all Jack was saying is let us count the costs and then decide who is going to pay those costs.

MR. CARMICHAEL: We will all pay because we are all in fact polluters. If General Motors had said a week ago let's stop all automobiles where they are and see where we would be now, this would hardly be the question or the answer. I should hope, although I presently perceive massive thrusts in opposition schemes whereby the consumption of energy for individualized transportation would be heavily regulated, that you could eventually purchase 30 horsepower per household at a relatively nominal amount. If you wanted an additional 10 horsepower perhaps you would pay an additional thousand. If you wanted another 10 perhaps you would pay another additional three thousand. This is what I meant in part by wants that become needs. To me it is entirely incomprehensible that any member of this society can go out and purchase as an extension of his ego, as I regard it, an automobile that produces 400 horsepower. It seems to me that what is needed is reversals of major patterns of consumption by disincentives, perhaps eventually by taxation. This carries over into energy consumption by industry. In water-short Colorado I can stand in my shower for 45 minutes and soak myself good and proper. It does not make any difference on my water

bill. However, if I had to pay \$2.00 for that luxury you can bet that I would think twice about it.

MR. SCHANZ: I would like to come back to a point that was made earlier about the forest reserve. In terms of the wilderness of the United States, if all the forests originally had either been set aside for some future date or been harvested, it would not have been proper. In other words, you have two polar positions. What economists are saying is that at some point in time a prudent decision must be made. The problem is that people tend to view prudent use in terms of immediate or latent use.

MR. McCLOSKEY: Let me go on to one of these attitudes about technical response. I heard a television statement about a young kid who in three weeks adapted a car to propane. The kid said if I did it in three weeks, why in the hell can't the automobile industry do it. Well, I think I appreciated the point, but when I thought of trying to adjust the whole delivery system of the nation to a propane delivery system, I think it would take a little bit longer than three weeks.

AUDIENCE: You would have to tear up a little more of our public lands to get some more propane.

MR. BALDWIN. I would like to make one point for our discussion. We have not really grown as an economy. We are suffering the effects of our growth through the environmental dislocation. Is it possible that we have reached a standard of living which is impossible to sustain. If we are going to account for these environmental dislocations, we are going to have to pay much more than we have thought of paying. Our standard of living will be reduced. If we are going to preserve the values that we now think are important, we can conclude that we will pay the prices. My question is—is that true?

MR. CARVER: You have a concept of limits, which is seldom understood, that must be understood. For example, from the time petroleum was developed initially, we have been doubling our consumption every eight to ten years. If we continue that percent of consumption rate for another hundred

years, in the succeeding one hundred years, our consumption will increase to the amount of 48,000 billion barrels of oil consumed per year. Obviously, we cannot continue to increase our consumption at that rate. If you consider this example as it relates to all of the fossil fuel which has been mined from the beginning of time and convert that amount into energy units, it is evident that one half of that total amount has been consumed in the last twenty years. This gives some idea of just how close we may be to the finite limits of this fuel. The problem relates back to what Frank Barry and Jack Schanz said: If you are going to have this massive change; namely, a reduction in consumption, sometime, attention must be focused on where and upon whom the burdens accompanying the change, are going to fall. Is it going to come by violent revolution, a possible result when people's needs and wants are electrical generation, instead of on electrical consumption, and then allow the thing to explode when people say that the burden is falling unequally on them; therefore they revolt?

MR. BALDWIN: I'll tell you where I think the price is being paid now. I think the price is being paid in the ghettos in the city where the people cannot go out and back pack, where they do not have clean water, and where they do not have clean air. These are the people who are paying. We are not paying, certainly not here.

MR. TRELEASE: Will the shift toward environmental quality and the additional cost in internalizing the externalities really shift the payment away from those people? We talk about more expensive automobiles. We talk about more expensive electricity. Well, I could afford a little more for my automobile, but I wonder, considering the margin in the ghetto, if we have really made a shift.

MR. SCHANZ: With the economists this pricing up, of course, is a penalty against consumption. This is a marvelous concept if we could only find out how to equitably manage it. We have had "a cheaper-by-the-dozen attitude." Now we need to get "an expensive-by-the-dozen attitude." We need to impose a penalty for higher horsepower, a penalty for greater consumption than we ordinarily need, a penalty for more tele-

vision sets if we are going to go in this direction. However, at the same time we must recognize that if the most affluent county of the United States were compared to the most poverty stricken county, it would be like going from the United States to the poorest member of the United Nations. We have to recognize that we are viewing a very broad spectrum of the public. Some of the people at the bottom of the spectrum are still consumer oriented. In their value judgments they say to hell with the back pack and the environment considerations. They want more of the material things. I am afraid that it is going to be very difficult to deny them this momentum.

MR. REAVLEY: In relation to this problem I think that we should be aware that we not only have our problems within this country, but we must relate them to all the other have-not countries. I'm not exactly certain of the statistics, but I understand that we represent about 6% of the world's population and use about 50% of the resources. It is rather embarrassing to talk with people in other countries who are on the other end of this situation. If the rest of the world would have the same affluence as America, the rest of the world would have to have retroactive birth control. By no means could we maintain our rate of affluence and keep all of the people alive.

MR. McCLOSKEY: Bill Reavley's point is certainly a good one. I have two other points that bear on this one. I don't think that in all of these areas, it is a question of suffering or not suffering. It is a question of how you suffer. We are suffering from smog because we have too many automobiles. This brings us to the next question: how is the problem to be handled? I think in the power fields, as has been suggested, we could have a rate structure reversal which would make power exceptionally cheap to those at the bottom of the economic spectrum. Then we could start the curve up so that when you get to larger or heavier uses of electricity, including industrial uses, the electricity would get more expensive. This is just an example. Many mechanisms might operate under these circumstances. The real question is: Do you really want to do it or is it a polemical ploy to make environmentalists

look bad. We'll get together with all the interests of this country in pursuing good social policy for the poor if someone is really interested in the context of the environmental disputes. I just wonder whether our collaborators are really there.

MR. MOCK: I never cease to wonder at the extent which our poor, simple public land law study can be interpreted. I have a great concern for our environmental problems. I am like all the rest of you. I am a schizophrenic too. If all the public lands of the United States were closed to any future development, would this solve the environmental problem? It may be that the environmental problem can be solved in a different way. A question which has plagued me is whether or not the environmental problem is going to be solved solely by use of the public land law provisions or are the public land laws to be used as a method to divert some of the social pressures into the areas which are established to cure these problems.

Now, Mike McCloskey, we return to your comment about the Commission being unbalanced. I think that you have really paid us a fine tribute by identifying the balance contained in the *Report*. You recognize the fact that we were trying to meet these problems that deal with all the national lands and all of the natural resources and the population areas without assuming a God-like quality in dictating the solution to the problems. We said in the *Report* that simply because we are dealing with public lands, we are not charged, nor do we attempt, to solve all of the national problems. We had to stick to our particular responsibility. We had to stick to our designated function. The things that are being discussed have identified the problems which faced the Commission. These problems have been laid in the lap of the nation after we identified them. Our purpose was to lay the foundation of a factual basis and analysis that would aid in the solving of these problems. Hopefully the use of this proper foundation would aid in the ultimate implementation of our proposals by those authorized to decide public land policy and use.

The biggest problem which faced the Commission was the determination of the use of the public lands for the people of the United States when, unfortunately, the people are not where the public lands are. We can't move the people to the lands and can't move the lands to the people. The problem, briefly stated, is how can we move the proceeds of the land to the people or to their best possible advantage.

MR. BALDWIN: The one point that you raised is discussed on page 227 of the *Report* where the Commission discusses the new town concept. The Commission recommends that prototype new cities be created on an experimental basis. Historically, our public lands have been disposed of in order to provide settlements for people and as a means of distributing national wealth. Today, we know that the environmental costs of our economic growth have fallen largely on the poor, for example in Appalachia, in the South and primarily in the cities. It is appropriate then that these people be served through public land policy, through the establishment of new cities and towns where they can have a new life and share the attributes of our living standards.

MR. MOCK: If this were an HEW convention we would be talking about many of the same things and we wouldn't pay any more attention to the public lands than we have in the last hour or so.

MR. BARRY: Let me say this, Byron. While this seems far afield, it is necessarily involved in what we are talking about. The last panel of speakers suggested that in order to maintain our standard of living we had to make certain sacrifices in our environment. In other words, we had to pay certain costs in order to do that. It has been suggested here that some of the strains on public lands and some of the pressure to get public land and attendant resources is attributed to the fact that we want to continue to increase our standard of living across the board, at least for the class of people to which we belong. If we continue to do that, what has been said here is very relevant and very true. We are going to put such terrific pressure on the public lands and the public resources that the environmentalists will get blamed. It really won't

make any difference who gets blamed, because everyone will be so furious at the shortages they will have to suffer they will invade public resources and dissipate them in some rash manner. There is no question about it. This is a danger with which to be concerned. The only way that we can forestall that result is to make these studies and consider the factors that keep the standard of living going up. Why is it that we do not have public transportation in our cities instead of thousands of automobiles taking people in and out of town polluting the air and consuming the oil and gas that is so precious? Why don't we make more efficient use of materials for housing and all the other population needs. Everybody needs a large tract, all the electricity he can consume, three cars and we are supposed to be looking forward to that great day when we can have five cars, 400 horsepower apiece. This we need to downgrade. We have to start to educate the public in the acceptance of a lower standard of living. I don't believe we can go on at the present level and continue to increase it indefinitely in the future. If we do we'll have trouble.

MR. MOCK: Let me reply to that before it gets loose. Some of you say that you might not mind lowering the standard, but I have a little trouble with mine and this is where we should start. The point is that when we look at these western lands, because they are so dominantly federally owned, we assume, perhaps I am overstating it, that they are all publicly owned. We say that if we stop the production of certain things, and if we restrict and minimize the accessibility to the resources in these unpopulated areas, we will automatically take care of the situation. I submit to you in the absence of broader and meaningful approaches to this, that we will create the damndest conservation problem you ever saw in forcing the exploitation of privately owned reserves to the detriment of our own best interests. I think that it is an anti-conservation program at this stage, if we are not looking in the broader sense at the national resources rather than those that just happen to be publicly owned.

MR. HANSEN: This discussion reminds me of the one that we had following the oil shale tour in Wyoming, Colorado,

and Utah, just a few weeks ago. We had our resident environmentalist on that tour also. When we got back to Denver and began to analyze the environmental impact of oil shale development, several of us recommended a total environmental resource inventory analysis. After I had made all of these recommendations and many others, the climate in the room was still and very uncomfortable. However, when I questioned whether we needed that 20 billion barrels of oil per day production, the chair immediately declared me out of order, and I was told to get back to the topic. I think this is one of the reasons why I was criticizing the Commission for not being creative and for not providing leadership in its role. I mentioned yesterday that we have a national goals commission as set up by President Nixon that doesn't come to grips with this either. This tends to make all of us psychologically uncomfortable. We don't want to deal with these problems. However, this is what the real world is coming to be. We can't consider the public lands and its resources out of context, not only with the problems in the ghetto but in Iran, Pakistan, and Yugoslavia. We are talking about a planetary problem as was pointed out. Whether or not we develop domestic supplies of minerals and petroleum affects exploration and development of petroleum all over the world. We have to start thinking that way. We can't think of these lands as being a western resource. These lands are a world resource.

MR. PEARL: I do not try to clear up any misconceptions or any of the interpretations that any of these people have formed about the Commission's *Report*. What I would like to do is what I tried to do before—to make comments specifically on items that I think are incorrect or where the Commission's *Report* had been misinterpreted in a matter to which I can give some positive direction—specifically, what was and what was not intended by the Commission.

Getting back to Ralph Johnson's statement where he asked whether you would transfer Mt. Rainier to the people in the State of Washington because of 60 per cent of the visitors were from the State of Washington. Of course, when you have a national park it has been designated as such because it

meets certain standards that require preservation. It makes no difference where the visitors come from—you would still have national park areas and other areas of unique significance. It would not be serving a local need. It would be serving a national need because of what you are preserving.

If you think that following a statewide plan turns control over to the state, you ought to talk to some of the state people, because the statewide plan required the approval of the Bureau of Outdoor Recreation. It is not a statewide plan unless it is approved. Many of the state and local governments have been screaming, and I have heard them, because the federal government is exercising too much control. This Commission recommended that lands, if they fit into a statewide plan, or local or regional use, should be turned over to the state, but only after the plan has been approved by the federal government. The federal government has a very heavy hand in the determination.

When we talk about a hunting and fishing fee on top of an annual recreation land use fee, keep in mind that this is only for the public lands. Remember too that we are talking about long range plans. The Commission is looking forward to at least 30 years from now on an overall basis. These goals cannot necessarily be achieved tomorrow. The same thing is true about the discrimination against non-residents who use the federal public lands. The Commission is not saying that this applies on all non-resident fees, just federal public lands. Ralph Johnson made the point that he got a non-resident fishing license at nominal fee, but go ahead and get one for big game and you might find it a little more different even here. When you go to some states you find that you have additional fee for hunting on federal public lands that are higher than fees for other lands in the state for non-residents generally.

One of the basic principles that the Commission has in its underlying program for the future is that the user, should have to pay fair market value. If the cattlement disagree with this basic principle it is obvious that he will not agree that it does equity for the recreational user to pay a nominal fee. However, if he agrees with the basic assumption that the non-

consumptive user should pay on the same basis as the consumptive user, he will agree that it is equity that everybody pay something instead of putting it up on a market. He might be able to get a \$25 admission fee or sometimes more in Yosemite, Yellowstone or some of these other places; but the nominal fee is in accordance with the Commission's basic premises.

Roger Hansen wanted to know what the hasty actions were by the Bureau of Land Management in the classification of multiple uses. I think that Roger knows that many of these uses were not decided by land use planning technique, but by looking at a map and drawing a line. We've done it on the best block theory. If you had a large segment of federal ownership then you just drew a line around it. It was not done on the basis of any previous or prior land use examination. The proposal was then given and they were then put in a position of defending it no matter what type of reaction they received.

When we talk about private enterprise having had the greatest impact on recreational development, we are thinking in terms of the fact that the policy has been to have private enterprise develop the facilities in the parks. In only isolated instances has the federal government put up its own money for the development of the facilities. One example of this would be in Glacier Bay, Alaska, where the Federal Government could not get any private enterprise to develop the facilities. None would risk any capital. The Commission recommends more government action in cases where it is necessary. In other words the federal government should expand its role if private enterprise is not able to do so. These facilities then could be leased for private operators, but in the past either in the forest or in the parks there has been very little investment of federal funds for development of recreational facilities. The concessioner has been the method utilized for having these facilities available to the public.

Roger, when you talk about the situation down in Maricopa County in Arizona, I am sure that you know what the rest of the people here may not know—that under the existing law Maricopa County can only acquire 640 acres a year in fee from the federal government under the Recreation and Public

Purposes Act for recreation use. Now if Maricopa County would continue to acquire that land that it has under lease from the federal government, I think it was estimated that it would take somewhere between 25 and 40 years. However, the Commission recommends that there be a flexibility injected and that the rigid regulations be eliminated. It was made to sound that Maricopa County was suffering, but remember the reason that they could not develop the facilities was that the county attorney rendered an opinion that they could not spend any county funds for the development of these park areas unless they had a fee title interest. Accordingly, the lease that they had from the federal government was meaningless. They needed a fee title which they could not get under the existing law. They had to get an act passed to allow them to purchase, but the Commission recommends a general law to permit flexibility in sales of land to states and counties where there is a plan for recreational development. Of course the type of development must be taken in consideration in permitting the sale.

I would like to make one last comment in regard to Mike McCloskey's statement that there were no environmental controls of the type that would have stopped the Santa Barbara incident. I think the Commission recognized and specified the need for special controls on the outer continental shelf in addition to the general controls that are generally recommended in the chapter on environment. The Commission set up procedures whereby these controls can be examined and stop the leasing. This is not to say to cancel the leases which have been issued but to stop a sale of lease from proceeding if they are dangerous to the environment. In addition to that, it is only natural to extend the Commission's recommendations on withdrawals to the establishment of sanctuaries, if you will, by an act of Congress, or if Congress wants to delegate some authority to the executive to do the same thing. In other words, the recommendations on withdrawal and reservations comes specifically to the point of saying that on large scale withdrawals, protection of certain values is needed.